

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
9-1-1 Resiliency and Reliability in Wake of)	PS Docket No. 11-60
June 29, 2012, Derecho Storm in Central,)	
Mid-Atlantic, and Northeastern United States)	

**REPLY COMMENTS OF THE NATIONAL ASSOCIATION OF
TELECOMMUNICATIONS OFFICERS AND ADVISORS**

The National Association of Telecommunications Officers and Advisors (“NATOA”)¹ submits these reply comments in response to the above-captioned Public Notice, released July 18, 2012, seeking comment on the “background, causes, and restoration efforts related to communications services and facilities impacted directly or indirectly” by the June 29, 2012 derecho or other natural disasters and the “impact these outages had on the various segments of the public, including consumers, hospitals, and public safety entities.”

NATOA commends the Commission and the Public Safety and Homeland Security Bureau for taking this action to better understand the impact of the derecho and other natural disasters on our nation’s communications services and facilities. Public safety and the protection of persons and property are of paramount importance to local governments. We sincerely hope

¹ NATOA is a national trade association that promotes local government interests in communications, and serves as a resource for local officials as they seek to promote communications infrastructure development.

that the information obtained via this proceeding will enable all interested parties to better understand why vital 911 systems failed and to use the lessons learned from these failures to better improve these systems as we move forward.

We look forward to the report being prepared by the Division of Communications of the Virginia State Corporation Commission (“VSCC”) on the disruption to 911 services in that state resulting from the derecho, along with a resolution of an investigation by the Maryland Public Service Commission (“MPSC”) concerning other 911 outage issues involving Verizon that occurred in 2011. We strongly urge that those reports, when ready, be made part of this proceeding.

Furthermore, NATOA hopes the record compiled in this proceeding will be shared and of use to the newly constituted FirstNet Board of Directors as it begins its work in planning the nationwide, interoperable public safety wireless broadband network. One of the Board’s duties is to ensure the resiliency of the new network. Unfortunately, the comments submitted to date show that even though emergency procedures had been put in place to address the potential loss of commercial power, current network monitoring practices, backup power plans (batteries and generators), and efforts to improve network diversity and redundancy failed in many jurisdictions.

We are encouraged that a number of service providers have stated that they are reviewing their response to the emergency and instituting corrective action. We urge **all** providers to review their emergency policies and procedures. In addition, we hope that industry will continue to reach out to their local public safety communications professionals so that they can work

cooperatively to improve these vital 911 systems that all our residents have grown to rely on.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "S. Traylor". The signature is fluid and cursive, with a large initial "S" and a stylized "T".

Stephen Traylor
Executive Director/General Counsel
NATOA
3213 Duke Street, #695
Alexandria, VA 22314
703-519-8035
September 4, 2012